



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 N. 5TH STREET  
KANSAS CITY, KANSAS 66101

NOV 14 2000

### MEMORANDUM

SUBJECT: Transmittal of Inspection Report - RCRA

FROM: Betty Berry, Chief  
ENSV/ARCM

TO: Ceclia Tapia, Chief  
ARTD/RESP

This memorandum transmits the following inspection report conducted by the Environmental Services Division:

Type of Inspection: CEI	Inspection Date: 9/28/00
Inspector: Richard McKiddy	
Facility Name: Industrial Laminates/Norplex	Facility I.D. Number: IAD073489288
Address: 665 Lybrand Street, Postville, IA 52162	Activity Number:
Facility Activity: manufacturer of industrial grade laminates	SIC Code: 3083
<b>Multimedia:</b> 1) Was a MM screening checklist completed? Yes a) Was the MM screening forwarded to another program? no 2) Was this inspection part of a Level C/D Multimedia Inspection? No <b>Other participating programs:</b> <b>Environmental Justice:</b> Was inspection conducted in a <u>potential</u> EJ Area (per MM screening checklist)? no <b>Small Business Regulatory Enforcement Fairness Act (SBREFA):</b> Was information provided? yes <b>Samples:</b> If samples were collected, were results sent to facility? na	
Preliminary Findings (list potential regulatory deficiencies): NOV/NOPF Issued? yes Potential SNC? no 1. 40 CFR 262.34(a)(2) - five 55 gallon hazardous waste drums in 90 day storage shed did not have dates of accumulation marked on the drums. 2. 40 CFR 265.16(d)(1) - no documentation of job title and name of person filling specific positions. 3. 40 CFR 265.16(d)(2) - no documentation of job description, including skills, education, qualifications and duties.	
Comments: Additional information was received via facsimile with reference to NOPF items 2 and 3.	

Attachments

4001  
R00176985  
RCRA RECORDS CENTER



## **REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION**

At: Industrial Laminates/Norplex  
665 Lybrand Street  
Postville, Iowa 52162  
Tel: (319) 864-7321  
EPA ID Number: IAD073489288

On: September 28, 2000

By: U. S. Environmental Protection Agency  
Region VII  
Environmental Services Division

### **INTRODUCTION**

At the request of the Air, RCRA and Toxics Division (ARTD), a Compliance Evaluation Inspection (CEI) was performed at Industrial Laminates/Norplex in Postville, Iowa, on September 28, 2000. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The inspection was a level B MMI; a Region VII Multimedia Screening Checklist is included with this report (Attachment 1). This narrative report and attachments present the results of the CEI.

### **PARTICIPANTS**

Industrial Laminates/Norplex (ILN)  
Mr. Scott Loven, Health, Safety and Environmental Quality Manager  
Mr. Daryl Szabo, Hazardous Waste Processor

U. S. Environmental Protection Agency (EPA)  
Mr. Richard N. McKiddy, Civil Investigator NOWCC/SEE

### **INSPECTION PROCEDURES**

I arrived at ILN at about 7:45 AM on September 29, 2000. I contacted Mr. Scott Loven, the Health, Safety and Environmental Quality Manager. I presented my identification to Mr. Loven and informed him I was at the facility to conduct a compliance evaluation inspection. I explained the purpose and procedure of the CEI to Mr. Loven and discussed the confidentiality of business information with him.

The CEI consisted of a discussion of operations, wastes generated, waste management practices, a review of pertinent documents and a visual inspection of the facility. This inspection was a limited focus CEI to review current operations and to follow up inspect areas of non-compliance observed during a previous inspection performed on July 28, 1998. The areas of previous non-compliance were in the accumulation and management of hazardous waste and lack of training documentation.

At the conclusion of the inspection, Mr. Loven was presented with the EPA Notice of Confidentiality. Mr. Loven declined to request confidentiality for business information and signed the form to indicate his choice (Attachment 2). He was given a Receipt for Documents and Samples, which he signed (Attachment 3). Mr. Loven was also presented with a Notice of Preliminary Findings (NOPF) which he signed, acknowledging receipt of the original (Attachment 4).

During the visual inspection, I was accompanied by Mr. Loven and Mr. Daryl Szabo, both of whom provided information and documentation.

## **FACILITY DESCRIPTION**

ILN has operated at its present location since 1974. Formerly, the company's name was Allied Signal Laminate Systems. The company's site is owned by Honeywell Corporation which merged with Allied Signal. ILN manufactures industrial grade laminates. Mr. Loven said that the typical solvents used are acetone and ethanol, which are stored in aboveground tanks. The solvents are pumped directly to the treater process rooms inside the plant. The treater units consist of large drip pans containing solvent and resin mixture. The base material for the laminates, either paper, cloth or fiberglass, is placed on a roller and fed through the solvent/resin mixture in the drip pan. The resin hardens the material to make the laminate sheets. The materials are further hardened by baking them in ovens, and then they are cut and placed in a press to form the various laminates. Wastes generated from operations at the plant include waste resin and spent solvent mixtures, resin-contaminated clean up rags, still bottoms from a solvent recovery still, spent parts washer solvent, used oil, and solvent contaminated groundwater.

Hazardous waste is generated in the facility's Still Room, the Epoxy Wash Area in the Wet End Treater 1 Area, the Phenolic Wash Area in the Upper Compound Room, and the Phenolic Wash Area in the Lower Compound Room. The facility has an outside 90 day storage shed.

ILN is a Large Quantity Generator, generating more than 1,000 kilograms of hazardous waste per calendar month. The waste codes are D001, D008, D018, D0039, D040, F003 and F005. ILN also generates used oil from maintenance of fork lifts and presses. Mr. Loven stated that the used oil is actually a water/oil mixture.

## **FINDINGS AND OBSERVATION**

The focus of this inspection was narrowed to a follow up inspection. A pre-inspection report received at the time of the assignment of the inspection defined "Specific Instructions Regarding Inspection." The instructions are as follows:

1. (Check) Failure to date drums with accumulation start date(s). Summary: An ignitable solvent/water mixture from a groundwater extraction procedure is stored in 55-gallon drums in the outside 90 day storage area. At the time of the July 28, 1998, inspection, ten of a total of

thirty 55-gallon drums of this waste were stored with only the month and day (no year) as the start accumulation dates. This is a D001, D007, D008 F003 and F005 hazardous waste.

2. (Check) 90 day storage area - one open drum. Summary: One of two 55-gallon drums of resin/solvent waste in the Treater 1 90 day storage area was found to be open (bung not in place) during the July 1998 inspection.. The waste codes identified for this waste are D001, F003 and F005 hazardous waste.

3. (Check) Four open drums (bungs not in place). Summary: During the July 1998 inspection, ILN maintained satellite accumulation areas at the Still Room satellite accumulation area, the Epoxy Wash satellite accumulation area in the Wet End Treater 1 Area, the Phenolic Wash satellite accumulation area in the Upper Compound Room and the Phenolic Wash satellite accumulation area in the Lower Compound Room. Each of these areas had a satellite accumulation drum with an open bung and no waste was being taken from or being placed into any of the drums.

4. (Check) weekly inspection checklists. Summary: An inspection of weekly inspection checklists on July 28, 1998, revealed that of seven inspection sheets inspected, two inspection sheets did not contain check marks next to the items to be inspected, but were signed to indicate the inspections had been conducted.

5. (Check) Annual Training; records not available at the time of the inspection. Summary: At the time of the July 1998 inspection, ILN could not provide training documentation that lists job titles and job descriptions for those personnel handling hazardous waste. Mr. Loven forwarded this information to EPA following the July 1998 inspection. Also, ILN could not provide documentation of training conducted on-site.

The summary information included above was obtained from the July 28, 1998, inspection report. The word "check", in parentheses, was added to clarify the pre-inspection instructions.

#### Waste Streams -

Since this was a follow up inspection, a review of the waste streams was conducted with Mr. Loven . The July 1998 inspection report describes the processes that generate the various waste streams in detail. In the review, Mr. Loven confirmed that the processes and waste streams are essentially unchanged since July 1998. Therefore, this report will describe the waste streams briefly and identify any changes from the previous inspection information.

It should be noted that in many cases the facility identified drums containing hazardous waste as less than 90 day storage drums, even though by regulation they qualify as satellite accumulation containers.

#### Resin and Solvent Mixture -

According to Mr. Loven, the processes which generates the resin/solvent mixture have not changed since the 1998 inspection. At the time of the inspection in 1998, Mr. Loven estimated that about 7,500 pounds of the resin and solvent waste were generated in a calendar month. He told me that about thirty 55-gallon drums of this D001, F003 and F005 waste are generated monthly. A potential violation was discovered during the July 1998 inspection when one of two 55-gallon drums of the solvent/resin mixture waste was found to be open (bung not in place). I did not observe any open drums in the Treater 1 90 day storage area during my inspection. There was one 55-gallon drum of epoxy waste in the Treater One room. The drum was closed, labeled hazardous waste and was dated (8-26-00). A photograph was taken of the drum (Photograph #9). The funnel in the drum is a closed top funnel. According to Mr. Loven, this drum and all other drums containing wastes are considered to be less than 90 day storage drums. The facility does not consider any drums containing waste as satellite accumulation containers. The containers are all dated when they are placed in their areas. Later, the drums are removed to the outside 90 day storage area when they become full or when the ninety day time limit approaches. The containers are all labeled as hazardous waste.

During the inspection, I observed drums of epoxy wash, phenolic wash, and melamine waste in the Still Room, the Wet End Treater 1 Area and the Upper Compounding Room. All the drums were marked with hazardous waste labels, dated, and closed. Again, Mr. Loven told me these drums were considered to be less than 90 day storage drums. Photographs were taken of these drums.

Photograph #2 shows four 55-gallon drums of solvent/mixture waste. The drums contain epoxy wash and phenolic wash. The three epoxy wash drums were dated with the following dates: 9/16/00, 9/22/00 and 9/23/00. Two of the epoxy wash waste drums were almost empty and the drum dated 9/16/00 was one-third full. The photo also shows one 55-gallon drum, dated 9/23/00, which was two-thirds full of phenolic wash waste. Mr. Loven told me these are less than 90 day storage drums, not satellite accumulation drums.

Photograph #3 shows two 55-gallon drums in another part of the Still Room. One drum contains epoxy wash waste and is dated (9/23/00), labeled and closed (blue drum on the left). The other drum (black color, on the right) is dated 9/22/00 and labeled phenolic wash. It is also closed. Neither of these drums appeared to be full.

Photograph #4 shows two 55-gallon drums located in the center of the Still Room. These two drums are labeled "Hazardous Waste" and "Scrap" and are dated 8/23/00 and 9/5/00. I asked Mr. Loven what waste was contained in the two drums. Mr. Loven told me that he was not sure, but believed it to probably be phenolic wash waste. I neglected to list the facility's failure to make a hazardous waste determination (40 CFR 262.11) in a Notice of Preliminary Findings that was issued to the facility following the inspection.

Photograph #8 was taken in the Wet End Treater One Room. The photograph shows three 55-gallon black drums of solvent/resin waste. There are two drums of phenolic wash waste and one

drum of epoxy wash waste. The two drums of phenolic wash waste are dated 9/6/00 and 9/22/00. The drum dated 9/6/00 is one-third full; the one dated 9/22/00 is three-fourths full. The epoxy wash waste drum is dated 9/26/00 and is one-third full. The drums are all closed and are labeled with hazardous waste labels which described their contents. Mr. Loven said that the drums are all considered less than 90 day storage drums and not satellite accumulation containers.

In addition to the drums containing the above-described epoxy and phenolic waste in the Treater 1 and Still Room, I observed eighteen 55-gallon drums of resin/solvent waste in the outdoor storage shed. Photographs #6 and #7 were taken of these drums, as well as drums of other waste (melamine (3), rags (1), still bottoms (2) and solvent-contaminated well water (2)). There were a total of twenty-six 55-gallon drums of hazardous waste in storage in the outdoor storage shed. The drums were in good condition and closed. Five drums were not dated, or the dates were painted over. All the drums were labeled to describe their contents and all except the five were dated. The oldest date observed, among the dated drums, was 7/25/00. The most recent date was 9/21/00. According to Messrs. Loven and Szabo, the five drums that were without start accumulation dates had been dated until just before I arrived at the storage shed to inspect it. Mr. Szabo is the employee who prepares the hazardous waste shipments for disposal. He keeps a hazardous waste log of all waste as it is received at the outdoor storage shed. Each drum is assigned a control number when it arrives and is logged. Each drum bears a dated label when it comes to the storage shed. When a shipment is prepared to be sent for disposal, Mr. Szabo stated that he spray paints over the dates on the old label and affixes a new DOT approved hazardous waste shipping label (standard yellow and red label) over the old label and transfers the date from the old label to the new shipping label. Mr. Szabo explained that the old labels sometimes get obscured or faded by solvents during handling inside the facility, thus all labels are changed. I examined the hazardous waste log and found it to be detailed, listing the container's control number, the date the waste is received at the storage area and the description of the waste in the container. When the waste on each log is shipped off-site for disposal, a notation is made on the reverse side of the last page of the log sheet stating How many drums were shipped, the date shipped and an itemized listing of the number of drums of each waste category (resin, melamine, still bottoms, etc.). The manifest document number is also listed, as is the total weight of the shipment. I obtained copies of the portions of the hazardous waste logs which describe the above mentioned information for the shipments which occurred on 2/4/00, 3/3/00, 4/7/00, 5/5/00, 7/7/00, and 8/4/00. The partial logs are attached to this report (Attachment 5).

A Notice of Preliminary Findings was issued to ILN for 40 CFR 262.34 (a) (2) - failure to date five 55-gallon hazardous waste containers in the 90 day outdoor hazardous waste storage shed with the start accumulation date. It appears that the drums were previously dated but were painted over. Mr. Szabo was working to change the labels at the time of my inspection and it appeared, from the location of the undated drums, that he was progressing through the stacks of drums in order. The undated drums were in the middle of two stacks (See Photograph #6). Drums with new shipping labels were on one side of the undated drums. Drums with old, dated, labels (presumably, yet to be changed) were on the other side of the undated drums. The NOPF was issued due to the labels not meeting the regulatory requirement of dating.

#### Clean Up Rags -

Clean up rags are used by ILN to wipe resin from the sides of containers and drip pans in the production areas. The rags are contaminated with resin. During the inspection, I observed 55-gallon drums containing soiled rags in the Still Room and in the Wet End Treater One Area. The drum in the still room was one-third full and was dated 8/8/00. It was closed and labeled with a hazardous waste label that described the contents as rags. The drum in the Wet End area was closed, labeled with the words rags and hazardous waste and was full. It was dated 8/31/00. Photographs were taken of the drum in the still room (Photograph #1) and the Wet End room (Photograph #8). There was one 55-gallon drum of soiled rags in the outside 90 day storage shed, which was labeled, dated and closed.

#### Still Bottoms -

ILN operates a solvent recovery batch distillation unit. Portions of the solvent/resin mixtures (epoxy and phenolic wash) are batch distilled to recover solvents. Mr. Loven told me about 1,000 pounds, or one and a half to two 55-gallon drums, of still bottoms are generated monthly from solvent batch distillation and disposed as hazardous waste. This is a D001, F003, F005 hazardous waste. The drum was photographed (Photograph #1).

During the visual inspection, I observed the solvent recovery batch distillation unit in the Still room. It was not in operation at the time of my inspection. There was one 55-gallon drum of still bottoms, dated 9/25/00 in the room. It was closed, labeled with a hazardous waste label and the words "Still Bottoms", and was in good condition. Mr. Loven said this drum is a less than 90 day storage drum, not a satellite accumulation drum. Another 55-gallon drum, also in the still room, was labeled with a hazardous waste label and the words "Still Bottoms." It was closed and in good condition. The date on the drum was 9/22/00. The drum was photographed (Photograph #5).

#### Spent Parts Washer Solvent -

ILN generates a small amount of parts washer solvent (spent petroleum naphtha) from leased parts washers that are serviced by Safety-Kleen Systems. Mr. Loven told me that the parts washers are used infrequently and that solvent is filtered. The spent petroleum naphtha is changed by Safety-Kleen approximately two times a year. I did not visually inspect or photograph the parts washers.

#### Used Oil -

Used oil is generated from service on fork lift trucks and laminate presses. Mr. Loven told me that he does not know the generation rate. He said that the used oil is actually a water/oil mixture. The used oil is contained in a 1,500-gallon used oil tank, located in the facility's boiler

room, until it is disposed off-site. I observed the tank to be marked with the words "Used Oil" and also observed it to be surrounded by a secondary containment wall which is approximately four feet high. Inside the containment area, there were two 55-gallon drums marked "Used Oil." I was unable to determine if the drums contained used oil. Mr. Loven did not know how much used oil was contained in the tank. He told me that the facility has a spill prevention and control countermeasures plan. A photograph (Photograph #10) was taken showing the tank and drums and the containment area.

#### Solvent-contaminated well water -

ILN generates an ignitable solvent and water mixture from a groundwater extraction process. The groundwater became contaminated with solvents at the time Allied Signal operated the plant. According to facility file information, Allied Signal made a hazardous waste determination on the well water as required by a corrective action order to clean up groundwater contaminated with toluene and methanol. The waste codes are D001, D007, D008, F003 and F005. Allied Signal has contracted with ILN to manage and dispose of this waste stream. ILN extracts well water daily and extracts about 3,480 gallons of the contaminated groundwater per quarter (1160 gallons per month). The waste well water is stored in the outside 90 day storage shed. At the time of my inspection, there were two 55-gallon drums of contaminated well water being stored in the outside storage shed. The two drums were closed, labeled as hazardous waste and dated. The drums were dated 9/19/00 and 9/21/00. These drums are among the twenty-six 55-gallon drums that were photographed in the outdoor 90 day storage shed (Photographs # 6 and #7).

#### Weekly Inspections -

I reviewed ILN's weekly inspection sheets for the year 2000. Mr. Loven stated that ILN inspects hazardous waste storage areas on a daily basis. Both Mr. Loven and Mr. Szabo report that they make visual inspections of containers of hazardous waste to ensure that the containers are closed, labeled, dated and not leaking. Once a week, the inspections are documented using an inspection sheet for that week. An inspection of the sheets for 2000 showed that the items are being inspected and check marks and notations are made, as needed. The records of inspections are filed in Mr. Loven's office and were readily available for review. I obtained copies of three recent weekly inspection sheets and they are attached to this report (Attachment 6).

#### Training -

Mr. Loven told me that all employees receive initial training soon after employment. He stated most of the employees are long-time employees and there is very little turnover in personnel. He also said that the employees receive DOT- and RCRA hazardous waste-related training annually. Sign in sheets are maintained to document the training. The facility had rosters of attendees for RCRA hazardous waste training as far back as 1996. I obtained a copy of the training attendance roster for persons who were trained in May, 2000. It is attached to this report (Attachment 7). The sign in sheet shows that nineteen employees were trained in May 2000. I also received a



copy of the training test that is given to employees to test their knowledge of hazardous waste management. The copy of the two-page test is attached to this report (Attachment 8). Mr. Loven gave me a copy of a "Certificate of Achievement" for a course in "Hazardous Waste Management: RCRA and DOT Regulations" that he recently attended in Minneapolis, Minnesota (Attachment 9).

During the inspection, Mr. Loven was unable to locate documentation required by 40 CFR 265.16(d)(1) and (2), which require that documents and records must be maintained at the facility to include the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job. Also required is a written job description for each position listed under (40 CFR 265.16) (d) (1) of this section, which must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position. Mr. Loven told me that the information is available and he stated he would fax the information to me. On October 2, 2000, I received a four page fax (including the cover sheet) containing job titles and descriptions for three positions where hazardous waste is managed: (1) Receiving, (2) Treater II Operator and (3) Treater Lead. The "Receiving" job title applies to Mr. Daryl Szabo, although the form does not specify to whom it applies. The "Treater Lead" and "Treater II Operator" job titles apply to individuals on three shifts who are engaged in these duties. No names are specified on the treater job description sheets. The information as to whom the descriptions apply was received from Mr. Loven in a telephone conversation following receipt of the documents. The copies are attached to this report (Attachment 10).

An NOPF was issued to ILN at the time of the inspection for 40 CFR 265.16(d)(1) and (2), for failure to have the above described information maintained on-site and available for inspection.

Photographs taken during the inspection are attached to this report (Attachment 11).

  
Richard N. McKiddy, Civil Investigator NOWCC/SEE Date: *Nov 14, 2000*

#### **ATTACHMENTS**

- 1 - Region VII Multimedia Screening Checklist (2 pages)
- 2 - EPA Confidentiality Notice (1 page)
- 3 - Receipt for Documents and Samples (1 page)
- 4 - Notice of Preliminary Findings (3 pages)
- 5 - Hazardous Waste Log Sheets (7 pages)
- 6 - Inspection Check Lists - Industrial Laminates/Norplex (3 pages)
- 7 - RCRA Hazardous Waste Training Sign In Sheet (1 page)
- 8 - RCRA Hazardous Waste Training Test (2 pages)
- 9 - Certificate of Achievement (for Training) - Mr. Scott Loven (1 page)
- 10- Job Titles and Descriptions - Industrial Laminates/Norplex (4 pages)
- 11 - Photographs (2 pages) (10 photographs)

## REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Industrial Laminated Property Facility Ownership Konyak Inspector Rubina M. Kelly  
 Street 665 Highway St. Facility Contact Mr. Scott L. Over Primary Media RCRA  
 City Portville Phone (319) 864-7321 SIC code 3541PT3 Inspector Phone Ext. 7036  
 State IA Zip 52162 Number of Employees ~120 Work Hours/Shifts 3 Shifts Date Sept 28, 2000

- What does the facility do? Manufacture industrial grade laminates, mostly for use in automotive industry
- Provide a brief process description: paper, cloth or fiber glass is fed on rollers, thru a solvent + resin mixture  
 (Check all that apply): Painting/Coating (Water-based ☐, Solvent-based ☐); Printing ☐; Reacting ☐; Formulating ☒; Distilling ☒; Parts Washers/Degreasing (Water-based ☐, Halogenated-based ☐, Non-halogenated-based ☒); Combustion (boiler, furnaces, oxidizers) ☒; Electroplating (Chrome ☐, Other none); Electro-less plating (Type none)

### ENVIRONMENTAL JUSTICE (EJ - Note: Only forward to EJ if a concern is also identified in one of the regulatory areas below)

- Is the facility located in a low income area (e.g., with many abandoned and dilapidated properties)? No ☒ (stop) Yes ☐  
 Is the facility located less than 1000 feet from the nearest routinely occupied property (house, school, etc.)? No ☒ Yes ☐ → **Forward to EJ**

### TOXIC SUBSTANCES CONTROL ACT (TSCA) EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA)

- Does the facility use more than 200 gallons or 1,500 pounds per month of the following (check all that apply): Acids ☐, Anhydrous Ammonia ☐, Chlorine ☐, Chlorinated Solvents ☐, Solvent-Based Paints ☐, or Solvents ☒? No ☐ (stop) Yes ☒ (Available on Envirofacts)  
 Have Toxic Chemical Release Forms (Form R) been submitted under Section 313 of EPCRA? Yes ☒ No ☐ → **Forward to TSCA**
- Does the facility store more than 100 gallons or 1,000 pounds of the following (check all that apply): Acids ☐, Bases ☐, Bulk Chemicals ☒, Anhydrous Ammonia ☐, Chlorine ☐, Chlorinated Solvents ☐, Fuels ☐, Gases ☐, Solvent-Based Paints ☐, or Solvents ☒? No ☐ (stop) Yes ☒  
 Have Hazardous Chemical Inventory Forms (Tier II) been submitted to local and state governments (Emergency Planning Committees or State Emergency Response Commission)? Yes ☒ No ☐ → **Forward to EPCRA** (Available on Envirofacts)  
 Have Risk Management Plans been submitted to EPA under Section 112r of the CAA? Yes ☐ No ☒ → **Forward to EPCRA**
- Does the facility have any equipment that contains PCB's at concentrations >500 ppm? No ☒ (stop) Yes ☐  
 Do you see any visibly leaking equipment (including wet or weeping equipment)? No ☒ Yes ☐ → **Forward to TSCA** (Get Photo)

### CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment

- Does the facility discharge any water to storm sewers, surface water, or the land? No ☐ (stop) Yes ☒  
 Are all of the water discharges permitted? Yes ☒ No ☐ → **Forward to CWA**
- Does the facility discharge process wastewater to the city POTW (Publicly Owned Treatment Works)? No ☐ (stop) Yes ☒  
 Are the discharges permitted by: The state? ☐ (Stop here) The city? ☒ No ☐ → **Forward to CWA**; scrubber water goes to POTW  
 Does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☒ → **Forward to CWA**
- Do you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ Location: N/A  
 Appearance of discharge: N/A (Get Photo) → **Forward to CWA**

### CLEAN WATER ACT (CWA) - Section 404 Wetlands

- Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☐ (stop) Yes ☒ a creek @ corner of property  
 Do you see any areas that have been filled, dredged, channelized, dammed, or had gravel removed from within the last 5 years? Property  
 No ☒ Yes ☐ → **FWD to Wetlands** When? N/A Location: N/A (Get Photo)

### SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

- Does the facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ → **Forward to UIC**  
 Do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☒ N/A
- Does the facility provide drinking water to 25 people or more from its own source (private well, pond, etc.)? No ☒ (stop) Yes ☐ → **Forward to PWS**  
 Does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☒ N/A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
CONFIDENTIALITY NOTICE

Facility Name <i>INDUSTRIAL LAMINATES/ NORPLEX</i>	
Facility Address <i>665 LYBRAND ST. POSTVILLE, IA 52162</i>	
Inspector (print) <i>RICHARD N. MCKIDY</i>	
U.S.EPA, Region VII, ENSV Division, <del>25 Funston Road</del> , Kansas City, KS <del>66115</del> <i>901 N. 5TH ST. 66101</i>	Date <i>9/28/2000</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <i>Scott Loven</i>	Signature/Date <i>Scott Loven 9/28/00</i>

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

---

---

---

---



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name <i>INDUSTRIAL LAMINATES/NOBLEX</i>
Facility Address <i>665 LYBRAND ST. POSTVILLE, IA 52162</i>

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☒

Split Samples: YES ☐ NO ☒

Documents/Samples were: 1) Received no charge ☐ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$  Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- 1- Seven (7) copies of pages of Hazardous Waste Log (7 pages)
- 2- Photographs (12) (10 photos)
- 3- RCRA Training Poster (year 2000) (1 page)
- 4- RCRA/Hazardous Waste Training Test (2 pages)

Facility Representative (print) <i>Scott Loven</i>	Signature/Date <i>Scott Loven 9/28/00</i>
Inspector (print) <i>RICHARD N. McKIDDY</i> ENVIROM	Signature/Date <i>Richard N. McKiddy 9/28/00</i>
U.S.EPA, Region VII, RCRA/IOWA, 726 Minnesota, Kansas City, KS 66101 <i>901 N. 3rd STREET</i>	

(rev:1/20/93)



# NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME:

ADDRESS:

EPA ID NUMBER:

DATE:

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. 40 CFR 262.34(a)(2) - Five 55-gallon drums in 90 day storage shed did not have labels or accumulation marks on the drums. Drums contained hazardous waste: phenolic + epoxy wash and malmatic. (See report - labels dated had been sprayed over in process of re-placing labels w/ shipping labels.
2. 40 CFR 265.16(a)(1) - no documentation of job title + name of person filling position specified
3. 40 CFR 265.16(a)(2) - no documentation of the job description including skills, education, qualifications + duties

If you have any questions regarding these findings please contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME:

TITLE:

SIGNATURE:

This document was prepared by

Page 1 of 1



# NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME:

ADDRESS:

EPA ID NUMBER:

DATE:

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. 40 CFR 262.34(a)(2) - Five 55-gallon drums in 90 day storage shed did not have labels of accumulation marked on the drums. Drums contained hazardous waste phenolic + epoxy wash and melamine. See report -
2. Labels dated had been sprayed over in process of re-placing labels w/ shipping labels.
3. 40 CFR 265.16(d)(1) - no documentation of title name of person filling material specified
4. 40 CFR 265.16(d)(2) - no documentation of the person designation including skills, education, qualifications, duties
5. 40 CFR 265.16(d)(2) - no documentation of the person designation including skills, education, qualifications, duties
6. 40 CFR 265.16(d)(2) - no documentation of the person designation including skills, education, qualifications, duties
7. 40 CFR 265.16(d)(2) - no documentation of the person designation including skills, education, qualifications, duties

If you have any questions regarding these findings please contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME:

TITLE:

SIGNATURE:

This document was prepared by

Page 1 of 1



# NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Industrial Ammonia/Complex  
 ADDRESS: 615 LYBURN ST.  
141 TVINE FA 3102  
 EPA ID NUMBER: LA0073479378 DATE: 9/29/00

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. 40 CFR 262.34(a)(2) - Five 55-gallon drums in 70 bag storage shed did not have labels + documentation marked
2. on the drums. Drums contained hazardous waste
3. plastic + empty work and materials. One report -
4. labeling labels w/ shipping labels.
5. 40 CFR 265.16 (1) - no documentation for 1/17/00
6. 40 CFR 265.16 (1) - no documentation for 1/17/00
7. including 1/17/00 documentation for 1/17/00

If you have any questions regarding these findings please contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Scott Loven TITLE: HSE Manager  
 SIGNATURE: Scott Loven

This document was prepared by Richard D. McLean

-578# #65 2-3-2000

Resin Solution

Foo 5

-530# #66 2-3-2000

Resin Solution

Foo 5

36 Returnables for credit  
137 Non Returnables

173 total Drums  
~~26~~  
~~40~~  
~~69~~  
~~22~~  
~~61~~

Shipped out 66 Drums on 2-4-2000

54 Drums Resin Solution 97020052-1FS 28,530#

2 Drums Raap A360408NF 400#

8 Drums Melamine Water A360409KF 4,192#

2 Drum Still Bottoms A360410TF 1,370#

manifest Document # 000204

total GR WT

35,494#



-480#	3	2-8-2000
-576#	4	2-9-2000
-497#	5	2-10-2000
-545#	6	2-11-2000
-582#	7	2-11-2000
-500#	8	2-14-2000
-592#	9	2-15-2000
-536#	10	2-16-2000
-502#	11	2-17-2000
-566#	12	2-18-2000
-572#	13	2-21-2000
-500#	14	2-22-2000
-538#	15	2-23-2000
-574#	16	2-24-2000
-514#	17	2-25-2000
-486#	18	2-28-2000
-542#	19	2-29-2000
-578#	20	3-1-2000
-534#	21	3-2-2000
-528#		

MELAMINE+WATER

Resin Solution

MELAMINE+WATER

Resin Solution

Shipped out 22 Drums on 3-03-2000

19 Drums Resin Solution 97020052-IFS  
10/112#

3 Drums Melamine+Water A360409LF  
1666#

11,778# total  
G.R.W.

PC

manifest document# 00303

[illegible]

F Manifest Document  
#00407

total Gross w  
17,766.75

- 540#	10	4-14-2000	Resin Solution	Foo5
- 546#	11	4-17-2000	Resin Solution	Foo5
- 552#	12	4-18-2000	Resin Solution	Foo5
- 560#	13	4-19-2000	Resin Solution	Foo5
- 730#	14	4-19-2000	R A G S	Foo5
- 200#	15	4-20-2000	R A G S	Foo5
- 600#	16	4-20-2000	STILL BOTTOMS	Foo5
- 598#	17	4-21-2000	Resin Solution	Foo5
- 532#	18	4-24-2000	Resin Solution	Foo5
- 538#	19	4-25-2000	Resin Solution	Foo5
- 562#	20	4-26-2000	Resin Solution	Foo5
- 560#	21	4-27-2000	Resin Solution	Foo5
- 458#				
- 520#				
- 500#				

Shipped out 24 Drums 5-5-2000

19 Drums resin solution 97020052-1FS 10,290

2 Drums rags A360408NF 330

2 Drums melamine + water A360409LF 1,062

1 Drum STILL BOTTOMS A360410TF 600

manifest Document #  
00505

12,288  
TOTAL GR

Drum #	QTY	DATE	DESCRIPTION	UNIT	
508#	39	6-9-2000	MELAMINE+ WATER	/	F005
536#	40	6-9-2000	MELAMINE+ WATER	/	F005
270#	41	6-12-2000	RAGS		F005
662#	42	6-12-2000	STILL BOTTOMS		F005
558#					
528#					
516#					
524#					
552#					
512#					
592#					
454#					
556					
528#					
568#					
544#					
554#					
528#					
510#					
549#					
470#					
542#					

Shipped out 60 Drums on 7-7-2000

49 Drums Resin Solution 97020052-1FS  
25,863 #

1 Drum Rags A360408NF  
270 #

6 Drums Melamine+Water A360409LF  
3,130 #

4 Drums Still Bottoms A360410TF  
2,514 #

Manifest # 00707

60 Drums total

31,777 # total

PS



Foo5

28 Drums Resin Solution 97020052-1FS 15.00

1 Drum RACS A360408NF

15005

300 #

5 Drums MELAMINE+WATER A360409 LF 265

2654 #

3 Drums Still Bottoms A3604107A

1612 #

manifest  
Document #

00907

19,571 #

~~total~~ WT/

## Sheet1

HAZARDOUS WASTE STORAGE AREA INSPECTION				
AREA:				
ITEM	RESULTS		CORRECTIVE ACTIONS	Date
	Adequate or yes	Inadequate or no	Needed	Accomplished
<b>AREA:</b>				
Hazard Sign	✓			
Access	✓			
Aisle Space	✓			
Housekeeping	✓			
Spilling		✓		
<b>AREA:</b>				
Leakage or Spillage		✓		
Grounded (if flammable)	✓			
Date (if drum in 90 day)	✓			
Damage		✓		
Tops Secured			Being out on drums	9/8/00
Labels	✓			
<b>AREA:</b>				
Leakage or Spillage		✓		
Hazard Signs	✓			
Piping Condition	✓			
Valves Condition	✓			
Tank Condition	✓			
Tank Supports	✓			
<b>AREA:</b>				
Surface Deterioration		✓		
Cracking		✓		
Leakage		✓		
Water Accumulation		✓		
<b>AREA:</b>				
Complete Inventory	✓			
<b>AREA:</b>				
Dust on ground		✓		
<b>AREA:</b>				
Particulates on roof		✓		
<b>AREA:</b>				
Surface Deterioration		✓		
Cracking		✓		
Leakage		✓		

\*\* CHECKS IN SHADED AREAS REQUIRE CORRECTIVE ACTION\*\*

Additional Comments:

Signature of Inspector

*[Signature]*

Date: \_\_\_\_\_

Signature of Supervisor

*[Signature]*

Date: 9/8/00



## Sheet1

## HAZARDOUS WASTE STORAGE AREA INSPECTION

AREA:		RES ULTS		CORRECTIVE ACTIONS	
ITEM		Adequate or yes	Inadequate or no	Needed	Date Accomplished
<b>AREA 1</b>					
Hazard Sign		✓			
Access		✓			
Aisle Space		✓			
Housekeeping		✓			
Spilling			✓		
<b>AREA 2</b>					
Leakage or Spillage			✓		
Grounded (if flammable)		✓			
Date (if drum in 90 day)		✓			
Damage			✓		
Tops Secured		✓			
Labels		✓			
<b>AREA 3</b>					
Leakage or Spillage			✓		
Hazard Signs		✓			
Piping Condition		✓			
Valves Condition		✓			
Tank Condition		✓			
Tank Supports		✓			
<b>AREA 4</b>					
Surface Deterioration			✓		
Cracking			✓		
Leakage			✓		
Water Accumulation			✓		
<b>AREA 5</b>					
Complete Inventory		✓			
<b>AREA 6</b>					
Dust on ground			✓		
<b>AREA 7</b>					
Particulates on roof			✓		
<b>AREA 8</b>					
Surface Deterioration			✓		
Cracking			✓		
Leakage			✓		

\*\* CHECKS IN SHADED AREAS REQUIRE CORRECTIVE ACTION\*\*

Additional Comments:

Signature of Inspector

Date:

Signature of Supervisor

Date:



## Sheet1

## HAZARDOUS WASTE STORAGE AREA INSPECTION

AREA:

ITEM	RES ULTS		CORRECTIVE ACTIONS Needed	Date Accomplished
	Adequate or yes	Inadequate or no		
<b>AREA</b>				
Hazard Sign	✓			
Access	✓			
Aisle Space	✓			
Housekeeping	✓			
Spilling		✓		
<b>DRUMS</b>				
Leakage or Spillage		✓		
Grounded (if flammable)	✓			
Date (if drum in 90 day)				
Damage		✓		
Tops Secured	✓			
Labels	✓			
<b>TANKS</b>				
Leakage or Spillage		✓		
Hazard Signs	✓			
Piping Condition	✓			
Valves Condition	✓			
Tank Condition	✓			
Tank Supports	✓			
<b>GROUND SURFACE</b>				
Surface Deterioration		✓		
Cracking		✓		
Leakage		✓		
Water Accumulation		✓		
<b>SPILL KITS</b>				
Complete Inventory	✓			
<b>DUST COLLECTION</b>				
Dust on ground		✓		
<b>ROOF</b>				
Particulates on roof		✓		
<b>EMPTY BARRELS</b>				
Surface Deterioration		✓		
Cracking		✓		
Leakage		✓		

\*\* CHECKS IN SHADED AREAS REQUIRE CORRECTIVE ACTION\*\*

Additional Comments:

Signature of Inspector

Date:

Signature of Supervisor

Date:

9/22/00

May 2000  
RCRA Training

	Balk	Joe		Hofschulte	Dan		Reinhardt	Rick
	Beisker	Kendal		Holliday	Baron		Roeder	Kevin
	Benson	Tom	RH	Huinker	Roger	Dr.	Roffman	Dan
	Bernhard	Brenda		Holthaus	Tom		Russett	Jim
	Berns	Gary		Houg	Lowell		Sampson	Jean
	Bissell	Jerry ←	MB	Jacobson	Bob		Scheidel	Barb
	Boese	Judy		Jarmes	Dorothy		Schlee	John
	Bries	Rod		Jennings	Gaylon		Schnuelle	Randy
	Brink	Melody	KJ	Johanningmeier	Kathy		Schultz	Stan
	Butikofer	Ken	LJ	Jones	Lorna		Seitz	Dave
	Cahoon	Perry		Jostand	Jerry		Shelton	Mona
	Christen	Kris	PK	Kuesner	Paul		Sieg	Deb
	Cooley	Dave		Langreck	Dennis		Sieg	Dennis
	Detra	Ralph	MF	Larkin	Greg		Smith	Jim
	Dundee	Gary	DL	Liebold	Dan		Smock	Steve
	Duvel	Patti		Mackay	Terri		Snitker	Steve
	Duvel	Ron	MM	Mc Nally	Terry	DS-	Szabo	Daryl
	Enyart	Hartly		Meyer	Nancy		Szabo	Dawn
	Erickson	Donna	AM	Meyer	Al		Thompson	Craig
	Erickson	Paul		Miller	Marty		Thornton	Cheryl
	Fosdal	Bob	mm	Miller	Melita		Thurn	Shawn
	Gordon	Dean	OS	Monroe	Al		Tieskoetter	Les
	Gordon	Cindy		Monroe	Denis		Van Wey	Don
	Grady	Ron		Morel	Dave		Wagner	Bill
BG	Gullickson	Bruce		Nuehring	Lee	DW	Walch	Darrin
	Gullickson	Don		Oelberg	Fred		Wedo	Audery
	Hanson	Ken		Palmersheim	Chris		White	Sherri
	Heins	Karen		Peterson	Clint		Wille	Dave
	Henry	Mary		Petsche	Lisa		Willie	Dottie
DH	Hesse	Dennis		Pritchard	Rita	W	Winters	Roger
JH	Hilgersen	Jeremy	DR	Radloff	Nancy		Wolfs	Luke
							Wright	Jack

## RCRA/Hazardous Waste Training Test

\_\_\_\_\_  
Name

1. **When does process material become hazardous waste?**
  - a. When it is no longer usable in production without being treated?
  - b. When it is pumped out of the dip pan and into a drum?
  - c. When it meets the RCRA definition of hazardous waste?
  - d. All of the above.
  - e. Both A and C of the above.
2. **A Label with the words "Hazardous Waste" should go on a drum when,**
  - a. The drum is full.
  - b. Before hazardous waste is first added to the drum.
  - c. Before the end of your shift.
  - d. Within three days of the drum being filled.
3. **Hazardous waste containers in satellite accumulation areas such as the lab,**
  - a. Must be moved to a 90-day storage area within 5 days of being filled.
  - b. Must have a label with the words "Hazardous Waste" on it.
  - c. Should be dated when hazardous waste is first added to the drum.
  - d. All of the above.
4. **All hazardous waste drums in a 90 day hazardous waste accumulation area must:**
  - a. Have a "Hazardous Waste" label.
  - b. Must be dated when hazardous waste is first added to the drum
  - c. Must be picked-up and removed from site within 90 days of when hazardous waste is first added to the drum.
  - d. Be placed so that the label is viewable.
  - e. All of the above.
5. **If today's date was 5/15/2000, and you were examining a drum with the date 2/30, you would consider the date to be within the 90-Day limit for storage of hazardous waste.**
  - a. Yes
  - b. No
  - c. Don't know
6. **A drum is RCRA empty (No longer considered to contain hazardous waste) when**
  - a. The hazardous waste label has been painted over.
  - b. Two thirds of the material in the drum has gone through the still.
  - c. There is less than 1" of material remaining in the bottom of the drum.
7. **It is all right to mix wastes from different waste streams. (T) (F)**



# *Certificate of Achievement*

This is to certify that

Scott Loven

has successfully completed a course of study in

**Hazardous Waste Management: RCRA and DOT Regulations**

Presented at Minneapolis, MN on September 19, 2000

*Kara B. Long*

Sr. Environmental Engr.

*Eric Spelber*

Consultant

To

901 North 5th Street  
Kansas City, KS  
66101

Richard N. McKiddy  
EPA-REGION VII-ENSV/ARCM  
Senior Environmental Employment  
(SEE) Program

OFFICE 913-551-7036  
FAX 913-551-8752  
McKiddy.Richard@EPAMAIL.EPA.GOV

Richard, I sent you the  
wrong Job Descriptions. These  
are the correct ones

Thanks

Scott Loven  
Norplex  
319-387-0581

## Industrial Laminates/Norplex - PPE/JSA HAZARD ASSESSMENT

10

**JOB TITLE: RECEIVING****JOB DESCRIPTION: POSITION SUMMARY:**

RESPONSIBLE FOR RECEIVING DISBURSING AND MAINTAINING ALL RAW MATERIAL AND SUPPLIES IN ASSIGNED LOCATIONS.

**RCRA RESPONSIBILITIES:**

APPLIES SHIPPING LABELS TO HAZARDOUS WASTE DRUMS, MOVES DRUMS TO 90 DAY STORAGE AREA, LOADS TRUCK FOR HAZARDOUS WASTE SHIPMENTS. ASSISTS HS&E MANAGER IN INSPECTION OF STORED HAZARDOUS WASTE.

**EQUIPMENT OPERATION:**

FORKLIFT, COMPUTER, COPIER, TELEPHONE, ELECTRIC TYPEWRITER, FAX MACHINE, HAND CART (S), UTILITY KNIFES, AND CAMERA.

**REMARKS: WORKING CONDITIONS - PPE REQUIRED:**

1. MOVES LARGE SKIDS AND OR/ROLLS OF MATERIAL WEIGHING IN EXCESS OF 50 POUNDS OUT OF TRUCKS INTO WAREHOUSE, AND THEN TO FLOOR LEVEL OR HIGHER ON OVERHEAD STORAGE RACKS (MECHANICAL OR HUMAN ASSISTANCE REQUIRED WHEN LOAD EXCEEDS 50 POUNDS).
2. RETRIEVES LARGE SKIDS AND OR ROLLS OF MATERIAL WEIGHING IN EXCESS OF 50 POUNDS, AND MOVE THIS MATERIAL FROM OVERHEAD STORAGE RACKS TO FLOOR LEVEL, THEN TO WORK SITES OF VARYING LEVELS THROUGHOUT THE PLANT (MECHANICAL OR HUMAN ASSISTANCE REQUIRED WHEN LOAD EXCEEDS 50 POUNDS).
3. SITS AT A COMPUTER TERMINAL FOR EXTENDED PERIODS OF TIME WHILE ENTERING DATA FROM WRITTEN DOCUMENTS AND LOGS.
4. COMMUNICATES EXTENSIVELY BY TELEPHONE.
5. EXPOSURE TO HEAT, DUST, FUMES, AND NOISE CONSISTENT WITH A WAREHOUSE/FACTORY ENVIRONMENT.
6. **EXPOSURE TO CHEMICALS (ACETONE, DMF, AND RESINS) WHEN UNLOADING TRUCKS. HEARING PROTECTION REQUIRED IN DESIGNATED AREAS.**
7. **SAFETY GLASSES REQUIRED AT ALL TIMES.**
8. **APPROPRIATE GLOVES REQUIRED AS ENVIRONMENT DICTATES.**

Certificate Of Hazard Assessment  
Hazard Assessment Performed By:

*[Signature]* Date: 9/23/99

ATTACHMENT 10 Page 2 of 4

## Industrial Laminates/Norplex - PPE/JSA HAZARD ASSESSMENT

26

**JOB TITLE: TREATER II OPERATOR****JOB DESCRIPTION: POSITION SUMMARY:**

RESPONSIBLE FOR HANGING ROLLS OF MATERIAL, AND ASSISTING THE TREATER OPERATORS AND THE TREATER LEAD.

**RCRA RESPONSIBILITIES:**

THE TREATER OPERATOR PLACES SPENT PRODUCTION CHEMICALS INTO HAZARDOUS WASTE DRUMS. HE/SHE ASSISTS IN THE MAINTENANCE OF THE SATELLITE ACCUMULATION AND 90 DAY STORAGE AREAS. AND MAY ASSISTS IN SPILL RESPONSE IN THE TREATER AREA.

**EQUIPMENT OPERATION:**

TREATERS INCLUDING UNWIND UNITS, ACCUMULATORS, SPLICE PRESSES, REWIND UNITS, B STAGE STACKER, UNLOAD CONVEYERS, UTILITY KNIFE, SCRAPERS, FORKLIFT, SCREW DRIVER, PLIERS, CRESCENT WRENCH, WRENCHES, OPEN BOX END WRENCHES, HAMMER, MANUAL BANDER.

**REMARKS: WORKING CONDITIONS - PPE REQUIRED:**

1. MOVES LARGE ROLLS OR SKIDS OF MATERIAL (WEIGHING IN EXCESS OF 50 POUNDS) FROM FLOOR LEVEL OR FROM OVERHEAD STORAGE RACKS TO TABLE LEVEL OR HIGHER, AND PLACE ROLLS ON MACHINERY. MECHANICAL AND HUMAN ASSISTANCE REQUIRED WHEN LOAD WEIGHS OVER 50 POUNDS.
2. WORK IS PERFORMED AT FLOOR LEVEL, TABLE LEVEL, AND SHOULDER LEVEL OR HIGHER, DEPENDING ON SPECIFIC JOB FUNCTION BEING PERFORMED.
3. MUST BE ABLE TO WORK AT ALL LEVELS DURING ROUTINE SHIFT. ABLE TO WORK IN ENVIRONMENT WHERE THERE IS FREQUENT EXPOSURE TO CHEMICALS, SOLVENTS, FIBERGLASS CLOTH, AND PHENOLIC, MELAMINE, AND EPOXY RESINS.
4. VISUALLY INSPECT CONDITION OF MATERIALS AND MACHINERY DURING A TREATER RUN, REQUIRING CLIMBING STAIRS AND LADDERS, INCLUDING LADDERS INTO THE TREATER TOWERS, IN VERY HOT CONDITIONS.
5. FREQUENT BENDING AND SQUATTING REQUIRED DURING SETUPS. ABLE TO WORK IN HOT ENVIRONMENT WHEN CLEANING TREATER TOWERS.
6. **HEARING PROTECTION REQUIRED IN DESIGNATED AREAS.**
7. **SAFETY GLASSES AT ALL TIMES.**
8. **APPROPRIATE GLOVES REQUIRED AS ENVIRONMENT DICTATES.**
9. **DUE TO THE PRESENCE OF CHEMICALS IN THE WORKPLACE, MUST BE RESPIRATOR CERTIFIED, AND ABLE TO PASS RESPIRATOR FIT TEST FOR SAFETY. NO INTERFERING FACIAL HAIR ALLOWED.**
10. EXPOSURE TO VARIOUS POTENTIALLY HARMFUL CHEMICALS, REQUIRING CARE IN HANDLING AND USE.

Certificate Of Hazard Assessment  
Hazard Assessment Performed By:

*Scott Davis* Date: 9/23/99

## Industrial Laminates/Norplex - PPE/JSA HAZARD ASSESSMENT

27

**JOB TITLE: TREATER LEAD**

**JOB DESCRIPTION: POSITION SUMMARY:** PERFORMS AS A WORKING LEAD-PERSON IN THE TREATER DEPARTMENT.

ASSISTS EMPLOYEES TO MEET PRODUCTION AND QUALITY STANDARDS AND HELPS EMPLOYEES AND SUPERVISORS TO SOLVE WORK RELATED PROBLEMS.

**SUPERVISION OR WORK DIRECTION OF OTHERS:**

MONITORS THE WORK OF TREATER OPERATORS AND TREATER ASSISTANTS AS DIRECTED BY THE SUPERVISOR.

**RCRA RESPONSIBILITIES:**

PLACES SPENT PRODUCTION CHEMICALS INTO HAZARDOUS WASTE DRUMS. HE/SHE ASSISTS IN THE MAINTENANCE OF THE SATELLITE ACCUMULATION AND 90 DAY STORAGE AREAS. AND MAY ASSIST IN SPILL RESPONSE IN THE TREATER AREA.

**EQUIPMENT OPERATION:**

TREATERS INCLUDING UNWIND UNITS, ACCUMULATORS, SPLICE PRESSES, WET ROOM EQUIPMENT AND CONTROLS, RESIN PUMPS AND SUPPLY SYSTEMS (TREATER WET END), THREADING DEVICES, RESIN FILTERS, COOLING WATER SYSTEM, REWIND UNITS, CROSS CUTTERS, STACKERS, TREATER MAIN CONTROL PANELS, CONVEYORS, OVERHEAD CRANES, RESIN SUPPLY SYSTEM (COMPOUND ROOMS), FORKLIFT, SCREW DRIVER, PLIERS, CRESCENT WRENCH, WRENCHES, OPEN BOX END WRENCHES, HAMMER, COMPUTER TERMINAL, TAPE MEASURE, CALIPER AND METER SCALE, FTIR, SOLVENT DISTILLATION UNIT.

**REMARKS: WORKING CONDITIONS - PPE REQUIRED:**

1. MOVES LARGE ROLLS OR SKIDS OF MATERIAL (WEIGHING IN EXCESS OF 50 POUNDS) FROM FLOOR LEVEL OR FROM OVERHEAD STORAGE RACKS TO TABLE LEVEL OR HIGHER, AND PLACE ROLLS ON MACHINERY. MECHANICAL AND HUMAN ASSISTANCE REQUIRED WHEN LOAD WEIGHS OVER 50 POUNDS.
2. WORK IS PERFORMED AT FLOOR LEVEL, TABLE LEVEL, AND SHOULDER LEVEL OR HIGHER, DEPENDING ON SPECIFIC JOB FUNCTION BEING PERFORMED.
3. MUST BE ABLE TO WORK AT ALL LEVELS DURING ROUTINE SHIFT. ABLE TO WORK IN ENVIRONMENT WHERE THERE IS FREQUENT EXPOSURE TO CHEMICALS, SOLVENTS, FIBERGLASS CLOTH, AND EPOXY RESINS.
4. VISUALLY INSPECT CONDITION OF MATERIALS AND MACHINERY DURING A TREATER RUN, REQUIRING CLIMBING STAIRS AND LADDERS, INCLUDING LADDERS INTO THE TREATER TOWERS, IN VERY HOT CONDITIONS.
5. FREQUENT BENDING AND SQUATTING REQUIRED DURING SETUPS.
7. **HEARING PROTECTION REQUIRED IN DESIGNATED AREAS.**
8. **SAFETY GLASSES REQUIRED AT ALL TIMES.**
9. **APPROPRIATE GLOVES REQUIRED AS ENVIRONMENT DICTATES.**
10. **DUE TO THE PRESENCE OF CHEMICALS IN THE WORKPLACE, MUST BE RESPIRATOR CERTIFIED, AND ABLE TO PASS RESPIRATOR FIT TEST FOR SAFETY. NO INTERFERING FACIAL HAIR ALLOWED.**
11. EXPOSURE TO VARIOUS POTENTIALLY HARMFUL CHEMICALS, REQUIRING CARE IN HANDLING AND USE.

Certificate Of Hazard Assessment

Hazard Assessment Performed By: Scott OwenDate: 9/23/99



**INDUSTRIAL LAMINATES/NORPLEX  
665 LYBRAND STREET  
POSTVILLE, IOWA 52162**

**PHOTOGRAPHS**

Industrial Laminates/Norplex, Postville, Iowa  
September 28, 2000 8:42 AM Photo #1  
Still Room, 90 day storage - 55-gallon drum (blk) contains solvent/resin-contaminated rags. Drum is closed, labeled and dated 9-25-00. The other 55-gallon drum (blue) contains still bottoms. It is closed, labeled and dated 9-25-00. The rag drum was 1/3rd full. The still bottom drum had a small amount in it (estimated less than 1/4th full).

Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 8:53 AM Photo #3  
Still Room, 90 day storage - 55-gallon drum on left contains epoxy wash. It is dated 9-23-00, labeled and closed. The drum on the right contains phenolic wash. It is dated 9-22-00 and is labeled and closed. I did not determine the amount of waste in these drums, but neither appeared to be full.

Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 8:55 AM Photo #5  
Still Room, 90 day storage - One 55-gallon drum of still bottoms. The drum is closed, labeled and dated 9-22-00.

Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 9:15 AM Photo #7  
Outside 90 day storage shed - Duplicated shot of the outdoor 90 day storage area.

Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 9:30 AM Photo #9  
Wet End, Treater One Room - 55-gallon storage drum of epoxy wash. The drum is closed, labeled and dated 8-26-00. The funnel is a spring top closed funnel.

Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 8:45 AM Photo #2  
Still Room, 90 day storage - Four 55-gallon drums in storage in still room. The 3 black drums contain epoxy wash. The drums are closed, labeled and dated, from left to right 9/23/00, 9/22/00 and 9/16/00. The blue drum contains phenolic wash. It is closed, labeled and dated 9/23/00. September 28, 2000. The phenolic drums (left to right) are full, full and 1/3rd full. The phenolic waste drum is 2/3rds full.

Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 8:54 AM Photo #4  
Still Room, 90 day storage - Two 55-gallon drums labeled as "Hazardous waste" and "Scrap" (no other descriptions). Mr. Scott Loven believes the drums contain phenolic wash. The drums were closed and dated (left to right) 9-5-00 and 8-23-00.

Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 9:15 AM Photo #6  
Outside 90 day storage shed - Twenty-six 55-gal drums containing hazardous waste (foreground). Drums in rear are empty drums. The 26 drums contain resin/solvent waste (18 drums); still bottoms (2 drums); soiled rags (1 drum); melamine waste (3 drums) and solvent-contaminated well water (2 drums). Drums 5, 6, 7, 12, and 14 in the double row of drums on the right were not dated (see report). The tops of the drums have been highlighted in pink.

Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 9:28 AM Photo #8  
Wet End, Treater One Room - Four 55-gallon drums in storage. All drums are labeled, closed, and dated as follows (left to right):  
1: Epoxy wash, dtd 9-26-00 1/3rd full  
2: Phenolic Wash, dtd 9-6-00 1/3rd full  
3: Phenolic Wash, dtd 9-22-00, 3/4ths full  
4: Soiled Rags, dtd 8-31-00, full  
Smaller containers are empty

Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 9:41 AM Photo #10  
Boiler Room - Used oil storage tank (1,500 gal) and two 55-gal drums of used oil inside containment area in the boiler room. The tank and drums are closed, no leaks, labeled used oil. The facility reportedly has a SPCC plan for the tank.



Industrial Laminates/Norplex, Postville, Iowa *RM*

September 28, 2000

8:42 AM

Photo #1

Still Room, 90 day storage - 55-gallon drum (blk) contains solvent/resin-contaminated rags. Drum is closed, labeled and dated 9-25-00. The other 55-gallon drum (blue) contains still bottoms. It is closed, labeled and dated 9-25-00. The rag drum was 1/3rd full. The still bottom drum had a small amount in it (estimated less than 1/4th full).

Industrial Laminates/Norplex, Postville, Industrial *RM*  
September 28, 2000 8:45 AM Photo #2  
Still Room, 90 day storage - Four 55-gallon drums in storage in still room. The 3 black drums contain epoxy wash. The drums are closed, labeled and dated, from left to right 9/23/00, 9/22/00 and 9/16/00. The blue drum contains phenolic wash. It is closed, labeled and dated 9/23/00. September 28, 2000. The phenolic drums (left to right) are full, full and 1/3rd full. The phenolic waste drum is 2/3rds full.

Industrial Laminates/Norplex, Postville, Industrial *RM*  
September 28, 2000 8:53 AM Photo #3  
Still Room, 90 day storage - 55-gallon drum on left contains epoxy wash. It is dated 9-23-00, labeled and closed. The drum on the right contains phenolic wash. It is dated 9-22-00 and is labeled and closed. I did not determine the amount of waste in these drums, but neither appeared to be full.





Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 8:54 AM Photo #4  
Still Room, 90 day storage - Two 55-gallon drums labeled as  
"Hazardous waste" and "Scrap" (no other descriptions). Mr. Scott  
Loven believes the drums contain phenolic wash. The drums were  
closed and dated (left to right) 9-5-00 and 8-23-00.

Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 8:55 AM Photo #5  
Still Room, 90 day storage - One 55-gallon drum of still bottoms.  
The drum is closed, labeled and dated 9-22-00.

Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 9:15 AM Photo #6  
Outside 90 day storage shed - Twenty-six 55-gal drums containing  
hazardous waste (foreground). Drums in rear are empty drums.  
The 26 drums contain resin/solvent waste (18 drums); still bottoms  
(2 drums); soiled rags (1 drum); melamine waste (3 drums) and  
solvent-contaminated well water (2 drums). Drums 5, 6, 7, 12, and  
14 in the double row of drums on the right were not dated (see  
report). The tops of the drums have been highlighted in pink





Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 9:15 AM Photo #7  
Outside 90 day storage shed - Duplicated shot of the outdoor 90  
day storage area.

Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 9:28 AM Photo #8  
Wet End, Treater One Room - Four 55-gallon drums in storage.  
All drums are labeled, closed, and dated as follows (left to right):  
1: Epoxy wash, dtd 9-26-00 1/3rd full  
2: Phenolic Wash, dtd 9-6-00 1/3rd full  
3: Phenolic Wash, dtd 9-22-00, 3/4ths full  
4: Soiled Rags, dtd 8-31-00, full  
Smaller containers are empty

Industrial Laminates/Norplex, Postville, Industrial  
September 28, 2000 9:30 AM Photo #9  
Wet End, Treater One Room - 55-gallon storage drum of epoxy  
wash. The drum is closed, labeled and dated 8-26-00. The funnel  
is a spring top closed funnel.



USED OIL  
952



Industrial Laminates/Norplex, Postville, Industrial

September 28, 2000

9:41 AM

Photo #10

Boiler Room - Used oil storage tank (1,500 gal) and two 55-gal drums of used oil inside containment area in the boiler room. The tank and drums are closed, no leaks, labeled used oil. The facility reportedly has a SPCC plan for the tank.